

Application No. 09/438,247  
Amendment dated October 14, 2004  
Reply to Office Action of July 14, 2004

### **REMARKS**

Claims 1-13 are pending in the application; the status of the claims is as follows:

Claims 1-3, and 5-13 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 4,606,066 to Hata et al ("Hata et al"), and further in view of U.S. Patent No. 4,271,476 to Lotspiech ("Lotspiech").

Claim 4 is objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

#### **35 U.S.C. § 103(a) Rejection**

The rejection of claims 1-3 and 5-13 under 35 U.S.C. § 103(a), as being unpatentable over Hata et al, and further in view of Lotspiech, is respectfully traversed because the combination of Hata and Lotspiech fail to teach the elements of the rejected claims.

Hata teaches an image processing high speed processing section 10 that is controlled by microcomputer section 20. High speed processing section 10 is composed of operational processor 11, parallel processor 12, address processor 13, and shared memory 14. Of the three processors, only the operational processor is described as performing image processing. Address processor 13 buffers image data from image memory 32 and supplies pixel data to shared memory 14. Operational processor 11 operates on the pixel data in shared memory 14 to perform image processing. Hata teaches that parallel processor 12 performs product-sum operation-like processing, but is otherwise silent as to parallel processor 12. *See* column 3, lines 7-23. Thus, Hata only teaches a single *image* processor.

Lotspiech teaches an apparatus for rotating the scan format of a digital image. The digital image is stored to a file 42. Sections of the image data are decompressed and temporarily written to memory 52. Control 54 uses windowing logic to write the data to memory 52 in a first, *e.g.* horizontal, scan direction. Control 54 then rotates the data by reading the data out of memory 52 in a second, *e.g.*, vertical, scan direction. The rotated data are then recompressed and returned to file 42. Thus, Lotspiech teaches a single processor that sequentially operates on windows of image data.

With respect to claims 1-3 and 5, it is respectfully submitted that the combination of Hata and Lotspiech fails to disclose, teach, or otherwise suggest all elements of the rejected claims. For example, the combination fails to disclose "a plurality of processors," or that the processors process "respective portions of input image data in parallel with each other," as required by claim 1. Accordingly, claim 1 distinguishes the combination of Hata and Lotspiech. Claims 2-3 and 5 depend from claim 1 and distinguish the cited art for at least the same reasons as provided in respect of claim 1.

With respect to claims 6-10, it is respectfully submitted that the combination of Hata and Lotspiech fails to disclose, teach, or otherwise suggest all elements of the rejected claims. For example, the combination fails to disclose "a plurality of processors performing prescribed processing on a plurality of data divided from single image data" as required by claim 6. Accordingly, claim 6 distinguishes the combination of Hata and Lotspiech. Claims 7-10 depend from claim 6 and distinguish the cited art for at least the same reasons as provided in respect of claim 6.

With respect to claim 11, it is respectfully submitted that the combination of Hata and Lotspiech fails to disclose, teach, or otherwise suggest "performing image processing on said divided image data with a plurality of processors." Accordingly, claim 11 distinguishes the combination of Hata and Lotspiech.

With respect to claims 12 and 13, it is respectfully submitted that the combination of Hata and Lotspiech fails to disclose, teach, or otherwise suggest all elements of the

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rejected claims. For example, the combination fails to disclose "first and second processors having an input image data port and an input image address port . . . and an output image data port and an output image address port" as required by claim 12. Accordingly, claim 12 distinguishes the combination of Hata and Lotspiech. Claim 13 depends from claim 12 and distinguishes the cited art for at least the same reasons as provided in respect of claim 12.

Accordingly, it is respectfully requested that the rejection of claims 1-3, and 5-13 under 35 U.S.C. § 103(a) as being unpatentable over Hata et al, and further in view of Lotspiech, be reconsidered and withdrawn.

#### **New Claims**

New claims 14 and 15 depend from claim 1 and, therefore, distinguish over the cited references for at least the same reasons as provided above regarding claim 1

#### **Objections**

The objection to claim 4 for being based on a rejected base claim is respectfully traversed because claim 4 depends from claim 1 which distinguishes the prior art for at least the reasons provided above. Accordingly, the objection to claim 4 should be withdrawn.

#### **CONCLUSION**

Wherefore, in view of the foregoing remarks, this application is considered to be in condition for allowance, and an early reconsideration and a Notice of Allowance are earnestly solicited.

This Amendment does not increase the number of independent claims and increases the total number of claims by 2 from 13 to 15 (20 previously paid for), but does not present any multiple dependency claims. Accordingly, no fee based on the number or

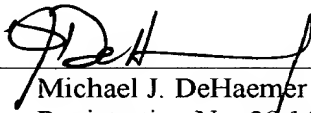
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type of claims is currently due. However, if a fee, other than the issue fee, is due, please charge this fee to Sidley Austin Brown & Wood LLP's Deposit Account No. 18-1260.

If an extension of time is required to enable this document to be timely filed and there is no separate Petition for Extension of Time filed herewith, this document is to be construed as also constituting a Petition for Extension of Time Under 37 C.F.R. § 1.136(a) for a period of time sufficient to enable this document to be timely filed.

Any other fee required for such Petition for Extension of Time and any other fee required by this document pursuant to 37 C.F.R. §§ 1.16 and 1.17, other than the issue fee, and not submitted herewith should be charged to Sidley Austin Brown & Wood LLP's Deposit Account No. 18-1260. Any refund should be credited to the same account.

Respectfully submitted,

By:   
Michael J. DeHaemer  
Registration No. 39,164  
Attorney for Applicants

MJD/llb:bar:jkk  
SIDLEY AUSTIN BROWN & WOOD LLP  
717 N. Harwood, Suite 3400  
Dallas, Texas 75201  
Direct: (214) 981-3335  
Main: (214) 981-3300  
Facsimile: (214) 981-3400  
October 14, 2004

DAI-304248v.5